

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

KELLEY RAY KAIGHIN,

Defendant.

Case No. 3:23-mj-00011-1

MOTION FOR REVOCATION OF  
DETENTION ORDER

COMES NOW the Defendant, Kelley Ray Kaighin, by and through his attorney, Tyl Bakker, hereby moves the Court, pursuant to Federal Rules of Criminal procedure 46 (a), and 18 U.S.C. §§ 3142 and 3145 (b), for an order revoking the order of detention previously entered in the above-entitled action on January 23, 2023. This request for relief is based on our belief that with our updated release plan there exists an adequate combination of conditions that will reasonably assure Mr. Kaighin's appearance as required and the safety of the community if he is released from pretrial confinement. The reasons for this request are more fully outlined in the attached Declaration of Counsel, which by this reference is incorporated, herein as though fully set forth.

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AUSA Lewis Burkhart does not object to the relief requested herein. This case is currently calendared on the Magistrate's docket for a Detention Hearing on February 3, 2023.

Respectfully submitted the 2nd of February, 2023

/s/ **Tyl Bakker**

Tyl W. Bakker, OSB #902000

Attorney for Kelley Ray Kaighin